

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

**IN RE:** : **CHAPTER 13 PROCEEDING**  
**MATTHEW THOMAS SCHAEFER** : **CASE NO. : 18-62370**  
**JENNY LYNN SCHAEFER** : **JUDGE RUSS KENDIG**  
**DEBTOR(S)** :

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**CHAPTER 13 TRUSTEE'S OBJECTION TO CONFIRMATION  
OF DEBTOR'(S) PLAN DATED NOVEMBER 27, 2018**

Now comes the Standing Chapter 13 Trustee, Dynele L. Schinker-Kuharich, for the above captioned case and objects to Confirmation of the Debtor'(s) proposed Plan on the grounds that said plan is in violation of 11 U.S.C. Section(s):

**Chapter 7 value**

1325 (a) (3) the plan has been proposed in good faith and not by any means forbidden by law.

1325 (a) (4) the value, as of the effective date of the plan, of property to be distributed under the plan on account of each allowed unsecured claim is not less than the amount that would be paid on such claim if the estate of the debtor were liquidated under chapter 7 of this title on such date.

**VALUE IN 2013 Ford F150 needs to be \$9,256.00**

**WHEREFORE**, the Standing Chapter 13 Trustee prays that the confirmation of the debtor(s) plan be **denied**.

/S/ Dynele L. Schinker-Kuharich  
**Dynele L. Schinker-Kuharich, Chapter 13 Trustee**

**CERTIFICATE OF SERVICE**

I certify that on January 11, 2019, a true and correct copy of the OBJECTION was served:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

REBECCA K HOCKENBERRY, on behalf of MATTHEW THOMAS and JENNY LYNN  
SCHAEFER, at rebecca@hockenberrylaw.com

And by regular U.S. Mail, postage prepaid, on:

NONE

/s/ Dynele L. Schinker-Kuharich  
Dynele L. Schinker-Kuharich, Chapter 13 Trustee  
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Canton, Ohio 44702  
330-455-2222